

- **Theodore Richardson v City of New York et al**, United States District Court, Eastern District of New York. 02 CV 3651
- **Phillip Stuart v City of New York**, United States District Court, Southern District of New York. 05 CV 2375
- **Benjamin Taylor v City of New York** United States District Court, Eastern District of New York. 01 CV 5750
- **Angel Vasquez v City of New York**, United States District Court, Eastern District of New York. 05 CV 3552
- **Alvin Williams v City of New York**, United States District Court, Southern District of New York. 05 CV 4013
- **Terrence Burton v City of New York**, United States District Court of New York, 06CV 6884

200. The foregoing policies, usages, practices, procedures and rules of the defendant “CITY” and “POLICE” constituted a deliberate indifference to the safety, well being, and constitutional rights of this plaintiff;
201. The foregoing policies, usages, practices, procedures and rules of the defendant “CITY” and “POLICE” were the direct and proximate cause of the constitutional violations suffered by this plaintiff;
202. The foregoing policies, usages, practices, procedures and rules of the defendant “CITY” and “POLICE” were the moving force behind the constitutional violations suffered by this plaintiff;
203. As a result of the foregoing policies, usages, practices, procedures and rules of the defendant “CITY” and “POLICE” this plaintiff was incarcerated unlawfully for

three days;

204. The defendants, collectively and individually under color of State Law, were directly and actively involved in violating the constitutional rights of this plaintiff;
2205. The defendants, collectively and individually under color of State Law acquiesced in a pattern of unconstitutional conduct by subordinate police officers, and were directly responsible for the violation of this plaintiff's constitutional rights;
206. All of the foregoing acts of the defendants deprived this plaintiff of federally protected rights, including but not limited to:

- a) Not to be deprived of liberty without due process of law;
- b) To be free from seizure and arrest not based on probable causes;
- c) To be free from unwarranted and malicious prosecution;
- d) Not to have cruel and inhuman punishment imposed upon him/her;
- e) To receive equal protection under the law.

207. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for his life, and sustained severe and other consequential damages;
208. This plaintiff intends to claim punitive damages for all counts;
209. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**THIRTY-SECOND COUNT - MALICIOUS PROSECUTION ON
BEHALF OF EDWARD JOEDD VASQUEZ**

- 210.. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1